

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Office of Engineering and Technology Seeks)	ET Docket No. 04-186
Comment on Nominet UK Proposal to be)	
Designated as a White Space Database)	
Administrator)	

To: Chief, Office of Engineering and Technology

COMMENTS OF REDLINE COMMUNICATIONS

Redline Communications (“Redline”) hereby submits these Comments strongly supporting the designation of Nominet UK (“Nominet”) as a white space database administrator under Part 15 of the Commission’s rules.¹ In addition, because Redline is concerned with the current state of the market for TV white space database administration services, Redline urges the Commission to expeditiously act on Nominet’s request and grant certification to Nominet as soon as practicable.

I. Background

Founded in 1998, Redline is a network designer and equipment manufacturer headquartered in Ontario, Canada. Redline services a wide variety of users and providers, including oil and gas, military, municipalities, utilities and other infrastructure operators, and telecom service providers. Redline’s versatile networks reliably and securely deliver voice, data, M2M and video communications for mission-critical applications.

¹ See Office of Engineering and Technology Seeks Comment on Nominet UK Proposal to be Designated as a White Space Database Administrator, *Public Notice*, ET Docket No. 04-186 (Apr. 9, 2018).

Redline has made significant investments in designing and deploying infrastructure that makes use of the TV white spaces spectrum. In fact, Redline's TV white spaces end-to-end networking system was the first such system to pass FCC testing and meet Industry Canada specifications. Redline is continuing to develop radio products for the TV white space bands and strongly believes the TV white spaces spectrum is a significant tool for the industries Redline serves. The TV white space bands will play an increasingly important role, particularly in rural areas and for critical infrastructure users that may not otherwise have access to adequate spectrum resources.

II. Redline Supports Nominet's Certification to Provide White Space Database Administrator Services.

Central to the TV white space paradigm is the requirement for unlicensed TV band devices ("TVBDs") to contact an authorized third party database system and operate only on those channels that the database indicates are available at the desired location.² The TV white space database administrator serves a key function of protecting incumbent users entitled to interference protection, including full power and low power TV stations, broadcast auxiliary point-to-point facilities, licensed wireless microphones, PLMRS/CMRS operations on channels 14-20, and the Offshore Radiotelephone Service.

The Commission has established a certification process whereby parties interested in providing TV white space database services must submit a proposal addressing how the basic components of a white space database required by the Commission's rules would be implemented, including data repository, data registration, and query functions. In addition, when previously certifying white space database administrators in 2011, the Commission required

² See 47 C.F.R. § 15.701 et seq.

applicants to 1) demonstrate compliance with the most recent version of the white space rules, 2) attend any workshops conducted by OET to address the operation of the databases to ensure consistency and compliance with the rules, 3) cooperate with any steps OET deems necessary to ensure compliance with the rules, and 4) agree not to use its capacity as a database manager to engage in any discriminatory or anti-competitive practices or any practices that may compromise the privacy of users.³

Nominet's proposal clearly meets these requirements. Nominet describes in detail how it will satisfy the Commission's requirements for data repository, data registration, and query processes. The capabilities are based on Nominet's already functioning TV white space database, which serves the UK and has been in operation for more than two years. In addition, Nominet has acknowledged the additional certification requirements imposed by the Commission in 2011 and has fully described how they will be met. Nominet has met, if not surpassed, the level of qualification demonstrated by other TV white space database administrators certified by the Commission.

Redline agrees with Nominet's statements that it will bring stability and reliability to the U.S. TV white space market. There should be no doubt that Nominet, the top-level domain administrator for the UK and operator of the first TV white space database approved for use in the UK, is capable of operating a TV white space database consistent with the public interest.

III. The Commission Should Expeditiously Grant Nominet's Certification.

Redline urges the Commission to expeditiously process Nominet's proposal and certify Nominet to provide TV white space database services.

³ Unlicensed Operation in the TV Broadcast Bands and Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band, Order, 26 FCC Rcd 554 (2011).

Redline notes that previously, the Commission also required that each administrator's database be subject to a public trial period of not less than 45 days before it could be made available for actual use by white space devices to allow interested parties an opportunity to check that the database is providing accurate results. Redline suggests that because Nominet has been operating a public TV white space database in the UK since 2016, a public trial period is not necessary. Interested parties and the Commission, have already had several months to review Nominet's database capabilities and express any concerns with Nominet's performance. Instead, the Commission should grant Nominet authority to operate its TV white space database upon certification.

IV. Conclusion

Redline respectfully requests the Commission expeditiously certify Nominet to provide TV white space database administration services consistent with the above comments. Such certification will help to ensure the continued growth and availability of the TV white space bands as a tool for end users and service providers.

Respectfully submitted,

REDLINE COMMUNICATIONS

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